

EXHIBIT C

Jeremy Roller

From: Jeremy Roller
Sent: Friday, May 10, 2024 7:22 PM
To: shm; JOSKIM@sternekessler.com
Cc: Alex Alfano; chen@shm.law; ELVIE-MOMCOZY-DJ; walters@lowegrahamjones.com; YANG Qianwu; shm
Subject: Shenzhen Root Technology Co., Ltd., et al. v. Chiaro Technology Ltd. -- Case Scheduling

Josephine,

We are writing to follow-up on the Court's Order Granting Motion to Amend Counterclaims and modifications to the case schedule necessitated by the amendment. We've discussed in our opposition to the motion to amend and in conferences between counsel the reasons we believe some modifications to the case schedule are necessary. I won't repeat those here, but rather go right to our proposal.

Wu sent a proposed modified schedule to you on April 9. In one of our conferences after that date, I suggested that we might have some flexibility on those dates. In hopes of resolving this by agreement, Momcozy proposes moving up the deadlines by a week from what we had proposed on April 9. Revised proposed dates are set forth below (along with the current schedule). As discussed in our prior conference, we suggest that the trial date be set after the Court issues its claim construction order, as Judge Evanson has done in the only other patent case in which she has issued a scheduling order that we could fine (at least as of a few weeks ago).

If Elvie agrees to these schedule modifications, Momcozy will authorize us to accept service of the summons and counterclaim on behalf of the new defendant, Shenzhen Xitao Network Technology Co. Ltd. Additionally, subject to Elvie's agreement to these schedule modifications, Momcozy will stipulate to Elvie's further amendment of its counterclaims to add Root Technology Ltd. and Momcozy will consent to us accepting service of a summons and counterclaim on behalf of Root Technology. We further suggest that the Momcozy entities (including the existing entities and the newly added Xitao party) be permitted 60 days from our agreement to answer the counterclaims.

Here is the revised proposed schedule:

Events Up To Claim Construction	Current Schedule	Proposed Modification (in blue)
JURY TRIAL DATE	September 2, 2025, at 01:30 pm	To be set by the Court
Length of Trial	10 days	10 days
Preliminary infringement contentions and disclosure of asserted claims	June 10, 2024	July 25, 2024
Disclosure of preliminary non-infringement and invalidity contentions	July 1, 2024	August 29, 2024
Exchange of Proposed Terms and Claim Elements for Construction	n/a	September 19, 2024
Preliminary Claim Chart Exchange of Preliminary Claim Constructions and Extrinsic Evidence	September 9, 2024	October 18, 2024
Joint claim-chart construction and Prehearing Statement	October 3, 2024	December 4, 2024
Opening expert disclosures for claim construction	July 29, 2024	December 4, 2024
Rebuttal expert disclosures for claim construction	August 23, 2024	January 3, 2025
Completion of claim construction discovery		January 30, 2025
Opening claim construction briefs	October 28, 2024	February 6, 2025

Responsive claim construction briefs	November 12, 2024	February 21, 2025
Claim construction hearing	December 16, 2024	To be set by the Court
Claim construction order		When issued by the Court

Please let us know if this is acceptable to Elvie. If it is, we will prepare a stipulated motion and order for your review. Thank you.

Jeremy

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